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GEAN LEONARD

SHERIFF

Galveston County 715 - 19th Street

Galveston, Texas 77550-2392 January 11, 2005

Area Code 409-766-2300

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Marlene H. Dortch, Secretary Federal Communications Commission 445 12th St. S. W. Washington, D. C. 20554

> Re: Petition for Rulemaking of LoJack Corporation Filed October 25, 2004

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Dear Ms. Dortch:

The Galveston County Sheriff's Office strongly supports the above-referenced Petition for Rulemaking ("Petition") filed by LoJack Corporation ("LoJack") requesting that the Commission expand the permitted uses and modify the technical requirements for operations on 173.075MHz. We also support LoJack's request, in the comments filed in ET Docket No. 04-243, that the Commission provide for a fourteen year transition period, commencing with the effective date of the final rules in the proceeding, to convert to narrowband operations on 173.075MHz.

The 361 officers in our agency serve the law enforcement needs for the entirety of Galveston County, Texas, focusing upon the delivery of direct services to unincorporated areas. We are also responsible for handling traffic enforcement on five arterial state highways and interstate highways which bring over one million vehicles into our county annually.

As described in the petition, LoJack seeks rule changes to allow it to provide public safety entities, such as our own, with additional services that will help us function better. LoJack also seeks changes to technical rules that, in addition to facilitating these additional services, will enable LoJack to improve performance of its stolen vehicle recovery system and to compensate for effects of converting to narrowband operations. We believe LoJack's system enhancements will provide notable benefits to us and the public we serve.

LoJack has paid off for countless crime victims, enabling recovery of their stolen vehicles in situations where they might not have been previously located. We have been involved in but a few recoveries in our area, primarily due to the fact that LoJack had not yet penetrated this

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market. However, I have been told of countless success stories in which LoJack has been the sole deciding factor in the recovery of literally millions of dollars in stolen property.

Our organization would use and benefit from LoJack's proposed new services. As an example, GPS-based positioning of a reported stolen vehicle enables us to better utilize our resources by dispatching LoJack-equipped patrol units to a particular area, enhancing our recovery possibilities. This clearly equates to less damage to stolen vehicles, improved recovery rates, and increased opportunities to apprehend suspects involved in commercial auto theft.

Such enhanced services also play a part in our battle against domestic and international terrorism. Our participation with other local, state, and federal law enforcement agencies involved with tracking the movements of hazardous shipments can benefit from LoJack's improved technology. Again, as with stolen vehicles, the rapid recovery of high-risk cargoes can do nothing but enhance security, particularly in our county that serves as home two major Texas ports and a major petrochemical complex.

We support LoJack's concept of including additional public safety and security features in its network. Their proposed enhancements, which include broader tracking capabilities and emergency notifications, are evident of their desire to provide better products to their customers while increasing public safety's involvement in fighting crime.

We respectfully ask the Commission to initiate the rulemaking LoJack has proposed in its Petition. We also urge the Commission to provide LoJack with the extended period requested for transition to narrowband operations.

Sincerely,

Maj. Ray Tuttoilmondo Bureau Commander

Criminal Law Enforcement